



SERVCO PACIFIC INC.

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February 5, 2009

Via Email: wyoshioka@honolulu.gov and Regular Mail

Mr. Wayne Y. Yoshioka, Director
Department of Transportation Services
City and County of Honolulu
650 South King Street, 3rd Floor
Honolulu, Hawaii 96813

RE: Honolulu High Capacity Transit Corridor Project
Draft Environmental Impact Statement/Section 4(f) Evaluation

Dear Mr. Yoshioka:

Servco Pacific Inc. ("**Servco**") is the landowner of the following parcels of real property (in Waipahu and Kakaako):

Waipahu: TMK: (1) 9-4-015-014
(1) 9-4-015-015
(1) 9-4-015-022
(1) 9-4-019-055
(1) 9-4-019-061 (1/11th ownership interest)

Kakaako: TMK: (1) 2-1-031-030

which are located adjacent to the contemplated Honolulu High Capacity Transit route (the "**Project**"). Servco has for many years operated automotive facilities at both locations. In addition, the current Conceptual Right of Way Plans show that a portion of one of the Waipahu parcels (TMK: 1-9-4-019-061) and the Kakaako parcel are both designated for partial acquisition as part of the Project.

Consequently, the planned Project has an immediate, direct, and material impact on Servco. Therefore we submit the following comments based on our review of the Draft Environmental Impact Statement for the Honolulu High Capacity Transit Corridor Project dated November 2008.

In general, we are concerned about the adverse impact on our customers, employees, business activities, and automotive facilities which will be caused by the planned construction activities, noise, dust, realigned traffic flow, and modified vehicular access into the Servco properties as work progresses along the Project route in the

vicinity of the Servco properties. The Draft EIS states that prior to commencement of construction, the contractor will be required to develop a plan to reduce economic hardship for existing businesses along the project alignment during construction activities. However, the draft EIS does not address whether the neighborhood businesses will be informed by the City or the Contractor on construction activities near their properties and if these businesses would be afforded an opportunity to participate and provide input into that plan prior to its adoption into the construction contract. Servco also understands that the Project will likely be constructed in multiple phases and therefore feels that plan to address and reduce economic hardship along the Project alignment should be developed, reviewed and commented on by the neighborhood businesses in phases matched up to the actual construction schedule. Servco feels it is vital for both the Contractor and City to effectively communicate the Project's ongoing construction work and schedule on a regular and weekly basis in order to mitigate and minimize hardships to these neighborhood businesses so unanticipated problems can be addressed promptly and effectively. In our view, the opportunity to submit our input and comments to the Contractor and City on how our operations may be affected by the Project's construction work and the Contractor's mitigation plan is essential. This will allow us a reasonable opportunity to plan our business activities on the Servco properties in anticipation of the construction period and the disruption it will inevitably create.

The Servco properties which will be impacted by the Project are (a) Servco Auto Leeward ("**SAL**"), which includes an automotive showroom, service and parts facility, fronting Farrington Highway at Waipahu Depot Street, and an open parking lot (TMK: 1-9-4-019-061) (the "**Waipahu Property**"), and (b) Motor Imports ("**MI**"), a service and parts facility located in Kakaako on the corner of South Street and Halekauwila Street (the "**South Street Property**"). The Project will run by Servco's SAL dealership along Farrington Highway, and the Waipahu Transit Station will be located on one of the Waipahu parcel that Servco has an ownership interest. Motor Imports in Kakaako will be affected by the construction of the Civic Center Station near and on a portion of the South Street Property. Our comments regarding these specific properties are provided below.

A. Waipahu Property:

1. Due to the 30-feet high fixed guideways in the vicinity of the Waipahu Transit Station the visibility of our SAL dealership will be greatly reduced. Automotive dealerships value high visibility, street frontage, and convenient street access to attract customers for its vehicles for sale and to provide convenient access to service area for vehicles and parts for its customers.
2. The planned Waipahu Transit Station on Farrington Highway is in close proximity to our SAL operation, and construction activities will impact

traffic flow in both directions. In addition, there is The Oahu Regional Transportation Plan 2030 which includes the Farrington Highway widening project to relieve traffic congestion between Golf Course Road and Fort Weaver Road. What is the schedule for these projects? Will construction be phased in such a manner that these projects will not overlap? Will the City be coordinating the Farrington Highway work with the State? Will the City be retaining a consultant for a traffic study for the impact of the Project on the Project's routes?

3. The water table in the Waipahu area is high. What is the potential impact on the surrounding structures due to displacement of groundwater during drilling and installation of the foundation for the light rail system and associated transit stations?
4. There are overhead and underground utility lines along Farrington Highway and the cross streets. Will SAL's utility service be disrupted when these utility lines along Farrington Hwy are relocated?
5. As noted above, Servco has a one-eleventh (1/11th) ownership in TMK: 1-9-4-019-061 in Waipahu. The City has plans for partial acquisition of this property. If traffic is rerouted to the cross streets of Awalu and Mokukaua, this will increase the vehicle traffic to the back of TMK: 1-9-4-019-055 which is wholly owned by Servco. As a landowner and business operator, how will we be kept informed of changes and activities affecting both parcels?

B. South Street Property:

1. Servco operates a parts and service facility on the South Street Property (TMK: 1-2-1-031-030). Automotive service operations are very land intensive. Pursuant to the Conceptual Right-of-Way Plans the City plans to acquire a portion of the South Street Property from Servco for the Civic Center Station. According to the Draft EIS, a land area of approximately 40 feet in width by 300 feet in length will be acquired. The proposed acquisition would involve the taking of the land and building housing our existing service bays and facilities, reduce the existing paved area for customer parking and adversely affect the existing South Street entry and exit into the South Street Property. The Draft EIS does not adequately consider a possible added cost to the City's acquisition of a portion of the South Street Property associated with coordinating the relocation of the service bays and facilities and reconfiguration of the South Street Property

so as to minimize disruption with the ongoing business activities on the South Street Property.

2. The Draft EIS does not adequately consider whether it is feasible for the Servco automotive business to continue in a reconfigured set up on the South Street Property after the taking of a portion of the South Street Property, and thus whether the City would have to acquire the entirety of the South Street Property and not just a portion thereof as currently contemplated in the Conceptual Right-of-Way Plan.
3. The Draft EIS does not appear to adequately consider the alternative of designing and building the Civic Center Transit Station on the vacant parcel of land located on the makai side of Halekauwila Street. Such an alternative could greatly minimize and mitigate the adverse impact on the existing Servco automotive facilities on South Street discussed in B.1 above.
4. The existing buildings on the property are older. We are concerned with how pile driving may affect the structural integrity of the buildings and the calibrated readings of automotive equipment used in Servco's automotive service business. Has consideration been given to alternatives that may be available to mitigate such impact?
5. Similar to the Waipahu Property, the water table in Kakaako is also very high. The Draft EIS does not indicate or adequately address how water displacement will be handled so as to protect and preserve the structural integrity of the structures on the South Street Property.
6. Street parking in the Kakaako area is inadequate at present. We are concerned that the influx of construction workers into the area during the course of the Project will make a bad situation even worse, as Servco employees, construction workers, and customers of neighborhood business will all be vying to use the already limited number of parking stalls in Kakaako. This problem will be compounded by lane closures and traffic circulation changes. The Draft EIS does not address how these problems will be mitigated or addressed? Will there be a traffic study on the impact of the Project for the Civic Center Transit Station and Halekauwila Street route?

As noted above partial land acquisition is planned for two Servco parcels, TMKs 1-9-4-019-061 (Waipahu) and 1-2-1-031-030 (Kakaako). The Draft EIS provides

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insufficient information on the acquisition process and procedure, including without limitation, its timing and manner of determining compensation to affected landowner.

In the process of finalizing its Environmental Impact Statement for the Honolulu High-Capacity Transit Corridor Project, we ask that the City & County of Honolulu prudently address and respond to our questions and concerns.

Sincerely,

SERVCO PACIFIC INC.

A handwritten signature in dark ink, appearing to read "Carol K. Lam", is written over the typed name.

Carol K. Lam (B)
Senior Vice President

cc: Ms. Katherine Puana Kealoha, Director
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